

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

Hearing Date: June 14, 2018
Hearing Time: 11:00 a.m.

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In re:

Lee Wong

Debtor.

Chapter 13
Case No.: 18-10095
Judge: Cecelia Morris

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**DEBTOR’S OPPOSITION TO MOTION FOR ORDER GRANTING RELIEF
FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362(d)(1) and 11 U.S.C.
§362(d)(2)**

Lee Wong, (the “debtor”), submits the following in opposition to Rushmore Loan Services Management, as servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not in its individual capacity, but solely as trustee for MFRA Trust 2015-1 (the “Movants”) motion for Relief from Stay (the “Motion”) pursuant to 11 U.S.C. §362(d)(1) and 11 U.S.C. §362(d)(2) , by attorneys, Cabanillas & Associates, P.C., and respectfully alleges:

1. On January 12, 2018 the debtor filed a voluntary petition for relief under Chapter 13 of Title 11 *et. seq.* of the United States Bankruptcy Code.
2. The debtor is a tenant in possession, he resides at the certain real property located at 12106 Purple Sage Ct, Reston, VA 20194 (the “Property”).
3. Rushmore Loan Services Management., as Trustee for LSF9 Master participation Trust now seeks relief from the automatic stay on the grounds that debtors are in default and that its interest in the Property is inadequately protected; thus it is entitled to relief from the stay pursuant to 11 U.S.C. § 362(d)(2).
4. Notwithstanding movant’s allegations, the debtor current on his trustee payments and the movant is adequately protected.

5. The debtor is showing good faith and has been making the necessary payments on the plan. Granting this motion will put the Debtor at risk of losing the property since a sale date could be scheduled immediately.

WHEREFORE, the debtor respectfully request that the instant Motion be denied; and the debtors be granted such other and further relief as this Court deems proper.

Dated: White Plains, NY
June 7, 2018

CABANILLAS & ASSOCIATES, P.C.

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